

1 Eric Stephen Freeze  
 2 47996 Moen Rd  
 3 Concrete, WA 98237  
 4 360 202 6178  
 5 ericfreeze87@gmail.com  
 Plaintiff in *pro per*

FILED  
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DEC 29 2022 JC

AT SEATTLE  
 CLERK U.S. DISTRICT COURT  
 WESTERN DISTRICT OF WASHINGTON  
 DEPUTY

BY

5 **IN THE UNITED STATES DISTRICT COURT**

6 **IN AND FOR THE WESTERN DISTRICT OF WASHINGTON**

7  
 8 Eric Stephen Freeze, )  
 Plaintiff, ) Case No.: *22-cv-1844-JLR*  
 9 vs. )  
 10 DON MCDERMOTT, RICHARD WEYRICH, )  
 LAURA M. RIQUELME, PAUL W, TAYLOR, )  
 BRET SACHTER, SANDRA PERKINS, LISA )  
 JANICKI, PETER BROWNING, RONALD )  
 WESEN, COUNTY OF SKAGIT, )  
 ELIZABETH E. GALLAGHER, JOSE T. )  
 ACUNA, ANN G. FREEZE REVOCABLE )  
 TRUST, and the RONALD L. FREEZE )  
 REVOCABLE TRUST )  
 Defendants )

11  
 12 NOW COMES Eric Stephen Freeze, Plaintiff, and files this Complaint against ELIZABETH E.  
 13 GALLAGHER; JOSE T. ACUNA, DON MCDERMOTT, RICHARD WEYRICH,  
 14 LAURA M. RIQUELME, PAUL W, TAYLOR, BRET SACHTER, SANDRA PERKINS, LISA  
 15 JANICKI, PETER BROWNING, RONALD WESEN and the COUNTY OF SKAGIT  
 16 WASHINGTON, Defendants, and for cause would show this Honorable Court as follows:  
 17  
 18

19 **I. PARTIES**

20  
 21 1. Plaintiff Eric Stephen Freeze is a law-abiding male adult of sound mind and a resident of  
 22 47996, 47972 Moen Rd, ( P. O. Box 12) Concrete, Washington 98237.  
 23  
 24 2. Defendants, DON MCDERMOTT, Skagit Sheriff, RICHARD WEYRICH, Skagit  
 25 Prosecuting Attorney, LAURA M. RIQUELME, Skagit Superior Court Judge, PAUL W,

1 TAYLOR, attorney, BRET SACHTER, attorney, SANDRA PERKINS, Skagit Auditor,  
2 LISA JANICKI, Skagit Commissioner, PETER BROWNING, Skagit Commissioner,  
3 RONALD WESEN, Skagit Commissioner, COUNTY OF SKAGIT, all have an office, or  
4 workplace in Seattle, Mount Vernon, Skagit County Washington. or Stratham, New  
5 Hampshire.  
6

7 **II. JURISDICTION AND VENUE**

8 3. Jurisdiction exists in this Court pursuant to 28 U.S.C. § 1331.  
9 4. Venue is proper before this Court because the facts and causes of action described herein  
10 took place within the Western District of Washington.  
11 5. This case meets the requirements of federal reasons for jurisdiction because diversity  
12 jurisdiction is applicable, violations of the U.S. Constitution, and federal laws and the  
13 amount in controversy is greater than \$75,000. The federal court would have had  
14 subject matter jurisdiction in the first place.  
15  
16

17 **III. STATEMENT OF FACTS**  
18

19 6. Plaintiff is a self-employed procurer of scrap metal, 35 years old, born in the house  
20 located at 47996, 47972 Moen Rd, Concrete, WA, hereinafter, Property, and residing at the  
21 same address since birth. Plaintiff is a citizen of Washington, united States.  
22

23 7. There is no dispute before this court.  
24

25 Defendants have agreed by tacit assent, tacit consent, acquiescence, and silence that they have  
26 violated Plaintiff's constitutional rights and federal laws.  
27

28 a. *"Indeed, no more than affidavits is necessary to make the prima facie case."*  
*United States v. Kis*, 658 F.2d 526, 536 (7th Cir. 1981)

b. *"An unrebutted affidavit stands as truth in law."* *Data Disc 2 Inc v Systems Tech Assoc Inc.*, 557 F2d 1260 (9th Cir. 1977)

c. *"In Commerce Truth is Sovereign. Truth is Expressed in the Form of an Affidavit.*

1 An Unrebutted Affidavit Stands as Truth in Commerce. An Unrebutted Affidavit Becomes  
2 the Judgment in Commerce. *Bey v. Stumpf*, no. 11-5684 (RBK) Dist. Court N.J (2011)

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8 d. *"If only one side of the conflict was supported by affidavit, our task would be relatively*  
9 *easy, for we may not assume the truth of allegations in a pleading which are contradicted*  
10 *by affidavit."* *Taylor v. Portland Paramount Corp.*, 383 F.2d 634, 639 (9th Cir. 1967) See  
11 Exhibits 1 A, 2 A, 2 B, 2 C,

12 e. Defendants DON MCDERMOTT, RICHARD WEYRICH, SANDRA PERKINS, LISA  
13 JANICKI, PETER BROWNING, RONALD WESEN, PAUL W, TAYLOR, BRET  
14 SACHTER, have received 3 affidavits, a default notice and are all in default.

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8. Plaintiff's father, Peter Freeze, borrowed money with co-signers (his parents) and did pay off  
the loan for the purchase of Property. Co-signers Ronald and Ann Freeze put the property  
purchased in a Trust and made their son Power of Attorney for the Trust without revisiting the  
property from their home in New Hampshire in over 18 years. The property was never removed  
from the Trust.

9. Peter Freeze entered into an Oral contract with Plaintiff to guard, maintain and repair  
property that included a commercial sawmill and a residence in exchange for ownership of the  
property upon his demise. Plaintiff mowed the premises for 20 years, repaired the foundation of  
the sawmill and residence, rewired both structures, installed new water lines, and new septic  
systems, reroofed both structures over the period of the last 20 years at Plaintiff's full expense  
for labor, equipment, materials, monies and time.

10. Peter Freeze became sick, and required Plaintiff to be his primary caretaker and remained  
on the property until his death, on November 13, 2021.

11. Within 2 days after Peter Freeze's death, Defendant, ELIZABETH E.GALLAGHER, JOSE T.  
ACUNA, and DON MCDERMOTT, Skagit Sheriff conspired to forcible attempt to vacate  
Plaintiff from the property by breaking, entering, confiscating property then changing the entry  
locks to Plaintiff's home without his foreknowledge, permission or compensation to Plaintiff

1 for any improvements upon the property. The oral contracts Plaintiff had with the Power of  
2 Attorney, Peter Freeze, were denied as well as any remuneration. See Exhibit 1 D, page 10  
3

4 12. Two days after Peter Freeze's death, Defendant ELIZABETH GALLAGHER and Defendant  
5 JOSE T ACUNA with the foreknowledge of Sheriff Don McDermott conspired to forcefully  
6 evict Plaintiff from his home as JOSE ACUNA agreed to buy the property as soon as Plaintiff  
7 was removed from the property. JOSE T. ACUNA submitted an affidavit to the court admitting  
8 he broke into Plaintiff's home in working in concert with ELIZABETH GALLAGHER and at  
9 her direction violated Plaintiff's 4<sup>th</sup> Amendment right. ACUNA, AT GALLAGHER'S  
10 instruction, broke into Plaintiff's home, stole a rifle, file folders containing purchase paper  
11 evidence, and Peter Freeze's phone, then Acuna removed the locks on the doors and replaced  
12 them with new locks and new keys locking Plaintiff out of his home, while Plaintiff was  
13 working, without his foreknowledge or permission. See Exhibit 1 D page 10  
14

15 13. Plaintiff called Skagit County Sheriff DON McDERMOTT to file a criminal report of the  
16 break-in and theft. The sheriff's deputy informed Plaintiff that the property Plaintiff called his  
17 home was in probate and therefore no criminal report would be filed.  
18

19 14. Plaintiff filed a lis pendens and a mechanic's lien upon the property and notified the  
20 Defendants that he would vacate the property as soon as the liens were paid. See Exhibits 1A,  
21 2A-C.  
22

23 15. Defendants were each sent affidavits of truth notifying them of the laws broken.  
24

25 16. Defendants took Plaintiff to court and sued for his eviction and Plaintiff represented himself  
26 pro per for economical reasons and failed to get the judge to be the guardian of his liberty.  
27 Plaintiff lost every motion entered even if the opposing attorney was late in responding or even  
28 if the attorney failed to appear in court to oppose Plaintiff.

1 17. Defendants, ELIZABETH E. GALLAGHER, PAUL W.TAYLOR, BRET SACHTER, ANN G.  
2 FREEZE REVOCABLE TRUST, and the RONALD L. FREEZE REVOCABLE TRUST  
3 proceeded to conduct their entire case on hearsay evidence. Not one witness with 1<sup>st</sup> hand  
4 knowledge was brought forth to testify or to be cross-examined. Violating Rule 802  
5  
6 18. Defendant Paul Taylor, without any 1<sup>st</sup> hand knowledge presented all statements given without  
7 being "sworn in". "Statements of counsel in brief or in argument are not sufficient for motion  
8 to dismiss or for summary judgment", *Trinsey v. Pagliaro*, D. C. Pa. 1964, 229 F. Supp. 647,  
9  
10 19. Plaintiff was diligent throughout and sent affidavits to answer every mailed response sent by  
11 the opposing attorney. Plaintiff alerted the opposing attorney of U.S. laws that attorney Paul  
12 Taylor was violating.  
13  
14 20. All Defendants, that received affidavits are in default as they did not answer. Affidavits were  
15 sent registered, certified, return receipt or first class U. S. P. S mail.  
16  
17 21. The unrebuted affidavits are true and prima facie before this court.  
18  
19 22. DEFENDANT LAURA M. RIQUELME was made aware by a mandatory judicial notice that  
20 the plaintiff's constitutional rights had been violated, several federal laws violated and that in a  
21 challenge of the jurisdiction to the court that the case should be transferred to federal court.  
22 RIQUELME violated her oath of office, Title 42 - U.S.C. § 1983, acting "under color of state  
23 law" to deprive civil rights and 18 U.S. Code § 4 - Misprision of Felony, failed to report  
24 felonies committed against Plaintiff to civil or military authority.  
25  
26 23. On or about June 2, 2022, RIQUELME ruled in favor of Defendants TAYLOR, TRUST and  
27 GALLAGHER without considering Plaintiff's Summary Judgment that was filed prior to  
28 Defendants' Summary Judgement.  
a. a prior ex parte hearing in which Judge Verge presided. Defendant Paul Taylor objected  
saying he and his client had nothing to do with the ex parte hearing.

1 b. Judge Verge told Plaintiff to address his issues to case No. 22-20016329. Plaintiff did that.  
2 Plaintiff refiled with the above case number.  
3 c. RIQUELME ruled that Plaintiff had violated a rule and sanctioned Plaintiff for violating a  
4 rule that did not apply.. RIQUELME failed to be the guardian of Plaintiff's liberty, *Platsky*  
5 *v. CIA, Haines v. Kerner, and* ruled Plaintiff had to pay a sanction  
6 d. Several months later Defendant Paul Taylor entered an Amicus Curiae in Case No. 22-2-  
7 20185-29 stating he and his client were a part of the subject matter in case No. 22-  
8 20016329 that he previously had Plaintiff Sanctioned for. See Exhibit 6.

9 24. On or about July 29, 2022, Defendant Jose Acuna filed in this court, an affidavit confirming his  
10 unlawful crimes conspired against Plaintiff with defendant Elizabeth E. Gallagher that was  
11 previously alleged by Plaintiff. See Exhibit 1D page 10

12 25. Plaintiff filed for an Appeal for the Summary Judgement with case no. No. 842544.

13 26. On or about October 31, 2022, Defendants TAYLOR, TRUST and GALLAGHER then had  
14 RIQUELME imposed a \$250,000 bond before Plaintiff could proceed with an open appeal.  
15 Plaintiff is self-employed and now unemployed without access to his tools, shop and metals  
16 that he accumulated to sell on his property. Defendants knew Plaintiff would not qualify for  
17 this exorbitant bond and failed to be the guardian of Plaintiff's Liberty. *Platsky v. CIA, 953*  
18 *F.2d 26., Haines v. Kerner, 404 US 519, 92 S. Ct. 594, 30 L. Ed. 2d 652.* It is obvious  
19 RIQUELME acted in a biased manner. This is a blatant violation of the 1<sup>st</sup> amendment and the  
20 right to redress grievances with the government, and denial of due process.

21 27. On or about December 9<sup>th</sup>, 2022, Plaintiff challenged jurisdiction and was denied, Plaintiff  
22 requested Findings of Fact and Conclusions of Law which have not been delivered.

23 28. Plaintiff submitted a Motion to Vacate court order of October 31, 2022, ordering Plaintiff to  
24 vacate the Property by December 1, 2022 followed by a Writ of ejectment executed by DON  
25 MCDERMOTT.

26 29. On or about December 23<sup>rd</sup>, 2022, Judge Yost denied all motions and requests made by  
27 Plaintiff to date. Defendant, Paul Taylor requested that Plaintiff not be allowed to enter any

more submissions to the court. Defendant Paul Taylor's reasoning was "We have to put a stop to these Pro se filings that clog the court with frivolous bizarre interpretations of Constitutional law." Judge Yost granted Defendant PAUL W. TAYLOR'S request and added that until Plaintiff paid a \$1750 sanction he was prohibited to submit any documents to the court and furthermore if he paid the \$1750, he would then have to get permission from the court before the documents would be filed by the clerk. This new evidence is a clear violation of Plaintiff's 1<sup>st</sup> Amendment right to petition the Government for a redress of grievances. See Exhibit 5.

30. There is no dispute before this court

31. Each affidavit sent by Plaintiff contained an invoice that Defendants agreed to the correct amount they owed. None of the Defendants answered even one of Plaintiff's affidavits.

32. Affidavits from Plaintiff to Defendants detailed the crimes committed, dates committed, and the perpetrator of the crimes. All Defendants agree they violated the Laws described.

33. Plaintiff is without a home, homeless, and without any means of maintaining a livelihood as all his tools, shop, and materials to sell are refused him by the court.

#### IV. CAUSES OF ACTION

34. Equitable estoppel is the legal doctrine that prevents Defendants from taking a position that is contrary to their previous position. This rule prevents Defendants from going back on their word in a court of law. Defendants are estopped from rebutting affidavits. Defendants forfeited their rights to refute their affidavits after 33 days of non-response.

35. The Defendants were in violation of both federal and state laws hence the need to cease and desist.

36. Defendant ELIZABETH E. GALLAGHER; JOSE T. ACUNA, conspired with DON McDERMOTT, RICHARD WEYRICH, BRET SACHTER, and, PAUL W. TAYLOR to

1 violate Plaintiff's 4<sup>th</sup> Amendment right of the people to be secure in their persons, houses,  
2 papers, and effects, against unreasonable searches and seizures.

3 37. These elected officials, DON McDERMOTT, RICHARD WEYRICH, SANDRA PERKINS,  
4 LAURA M. RIQUELME, LISA JANICKI, PETER BROWNING, and RONALD WESEN are  
5 thus not entitled to qualified immunity as they violated "clearly established law," codified at 42  
6 U.S.C. § 1983, 1<sup>st</sup> and 14<sup>th</sup> Amendments, denying due process of law, and the right to petition  
7 the Government for a redress of grievances of infringement upon the rights of Eric Stephen  
8 Freeze.

9 38. Plaintiff sent an affidavit to Defendants proclaiming to SANDRA PERKINS, Auditor, LISA  
10 JANICKI, Commissioner, PETER BROWNING, Commissioner, RONALD WESEN that  
11 felonies had been committed against him.

12 39. All Defendants have violated 18 U.S. Code § 4 - Misprision of Felony by failing to report the  
13 crimes in Plaintiff's affidavits.

14 40. All six Skagit County elected Officials, DON McDERMOTT, Sheriff, RICHARD A.  
15 WEYRICH, District Attorney, SANDRA PERKINS, Auditor, LISA JANICKI, Commissioner,  
16 PETER BROWNING, Commissioner, RONALD WESEN, Commissioner, have also violated  
17 numerous federal laws and have admitted to their violations by tacit assent, and are in default  
18 for a cure.

19 41. The Federal laws violated by Defendants listed as six Skagit County Washington elected  
20 Officials are violations: of their oaths of office, the 1<sup>st</sup> and 14<sup>th</sup> Amendment of the U.S.  
21 Constitutions, Title 42 - U.S.C. § 1983, repeated violations of Freedom of Information Act  
22 Section FOIA, 25-19-104, Civil rights act of 1871, 42 U.S.C. 1985, 18 U.S. Code § 4 -  
23 Misprision of Felony, 18 U.S.C. §§ 1961–1 RICO. Defendants DON McDERMOTT,  
24 RICHARD WEYRICH, SANDRA PERKINS, LISA JANICKI, PETER BROWNING,  
25

1 RONALD WESEN, PAUL W, TAYLOR worked in concert with ELIZABETH E.  
2 GALLAGHER, and JOSE ACUNA in a pattern and practice to harm and perform unlawful  
3 actions against Plaintiff by failing to enforce and uphold the laws of the U.S. Constitution, the  
4 United States, and the state of Washington. The Skagit county elected officials failed to  
5 respond to the Plaintiff's pleas for protection, relief from lawlessness or attempts of redress of  
6 grievances and failed to perform their official duties including the reporting of felonies to  
7 Superior, or Appellate, or Supreme courts or the military. 18 U.S. Code § 4 - Misprision of  
8 Felony

9  
10 42. The Defendants were thus in violation Article V section 16, Washington Constitution 1889, the  
11 right of the people to petition for redress of grievances shall never be restrained or abridged.

12  
13 43. The Defendants were thus in violation of Article V section 5 Washington Constitution 1889, by  
14 depriving Plaintiff of life, liberty, or property without due process of law and equal protection  
15 under the law. Washington Constitution 1889 adopted the Constitution of the United States as a  
16 Supreme Law. (National Archives, Washington D. C.)

17  
18 44. The Defendants were thus in violation of their oath of office. RCW 29A.56.110: neglect or  
19 knowing failure by an elective public officer to perform faithfully a duty imposed by law. [  
20 2003 c 111 1407; 1984 c 170 1; 1975-'76 2nd ex., Deprivation of rights under color of law 18  
21 U.S. Code § 242, 18 U.S.C. § 241 (also RCW 9a.80.010), RCW 36.28.011

22  
23 45. The section provides as follows;

24  
25  
26  
27  
28 *"Whenever any legal voter of the state or of any political subdivision thereof, either  
individually or on behalf of an organization, desires to demand the recall and discharge  
of any elective public officer of the state or of such political subdivision, as the case  
may be, under the provisions of sections 33 and 34 of Article 1 of the Constitution, the  
voter shall prepare a typewritten charge, reciting that such officer, naming him or her*

1           *and giving the title of the office, has committed an act or acts of malfeasance, or an act*  
2           *or acts of misfeasance while in office, or has violated the oath of office, or has been*  
3           *guilty of any two or more of the acts specified in the Constitution as grounds for recall.*  
4           *The charge shall state the act or acts complained of in concise language, give a detailed*  
5           *description including the approximate date, location, and nature of each act*  
6           *complained of, be signed by the person or persons making the charge, give their*  
7           *respective post office addresses, and be verified under oath that the person or persons*  
8           *believe the charge or charges to be true and have knowledge of the alleged facts upon*  
9           *which the stated grounds for recall are based.*

10  
11           *For the purposes of this chapter:*

12  
13           *(1) "Misfeasance" or "malfeasance" in office means any wrongful conduct that*  
14           *affects, interrupts, or interferes with the performance of official duty;*

15  
16           *(a) Additionally, "misfeasance" in office means the performance of a*  
17           *duty in an improper manner; and*

18  
19           *(b) Additionally, "malfeasance" in office means the commission of an*  
20           *unlawful act;*

21  
22           *(2) "Violation of the oath of office" means the neglect or knowing failure by an*  
23           *elective public officer to perform faithfully a duty imposed by law."*

24  
25           46. The elected Defendants were thus guilty of misfeasance, malfeasance, and violation of their  
26           Oath of Office since their action interfered with the performance of the official duty of the  
27           Plaintiff by failing file a criminal report, investigate the crimes and indict the self-confessed  
28           criminals.

1       47. The elected Defendants are also guilty of a misdemeanor, precisely, the failure of duty by  
2       public officer. RCW 42.20.100 provides failure of duty by public officer a misdemeanor as  
3       follows;

4       *“Whenever any duty is enjoined by law upon any public officer or other person holding  
5       any public trust or employment, their willful neglect to perform such duty, except where  
6       otherwise specially provided for, shall be a misdemeanor.”*

7  
8       (2) *“Disclosable information” means public information that (a) is not exempt  
9       from disclosure under chapter 42.56 RCW; and (b) does not pertain to an  
10       ongoing investigation.*

11  
12       (3) *“Fraud” means an intentional deception or misrepresentation made by a  
13       person with the knowledge that the deception could result in some unauthorized  
14       benefit to himself or herself or some other person.*

15       (4) *“Office” means the office of fraud and accountability.*

16       48. The elected Defendants were thus guilty of FRAUD AND FALSE STATEMENTS 18 U.S.  
17  
18       Code Chapter 47 and misrepresentation by alerting the Plaintiff that he had to vacate his home  
19       without due process using the pretense of a probate cause required the Sheriff to force eviction.  
20       Plaintiff, the only heir of Peter Freeze, knew the “Trust” didn’t die, and assumed the probate  
21       must have been for the rightful owner, his dad, Peter Freeze. This was an embellishment by  
22       Defendant ELIZABETH E. GALLAGHER that was accepted by Sheriff DON McDERMOTT  
23       and the prosecuting attorney RICHARD WEYRICH who then enjoined the embellishment  
24       agreeing to force Eric Stephen Freeze from his home of 35 years even though there was no  
25       death or need for probate in a TRUST.

26  
27       49. Moreover, the Defendants were in violation of RCW 9A.80.010 which makes provision for  
28       official misconduct thus;

1                   “(1) A public servant is guilty of official misconduct if, with intent to obtain a benefit or  
2                   to deprive another person of a lawful right or privilege:  
3                   i. He or she intentionally commits an unauthorized act under color of law; or  
4                   ii. He or she intentionally refrains from performing a duty imposed upon him or  
5                   her by law.”

6  
7                   50. The Defendants forced Plaintiff from his home with a bogus writ of ejection, failed to protect  
8                   Plaintiff from the violations of his constitutional rights, and secured Plaintiff’s personal  
9                   property.

10  
11                  51. The Defendants were also intentionally and repeatedly in violation of RCW 42.56.520 which  
12                  provides for prompt responses. Local government agencies are required by the provision to  
13                  respond to a public records request within five business days of receiving the request by doing  
14                  one of the following: Providing for inspection and/or copying of the records requested. the  
15                  Defendants willfully neglected to give responses to Plaintiff upon request. Willful neglect to  
16                  answer Public Records and FOIA Requests.

17  
18                  52. The Defendants are further guilty of a gross misdemeanor by violating RCW 29A.56.110.  
19                  RCW 29A.84.020 precisely provides that every officer who willfully violates RCW  
20                  29A.56.110 through 29A.56.270, for the violation of which no penalty is prescribed in this title  
21                  or who willfully fails to comply with the provisions of RCW 29A.56.110 through 29A.56.270  
22                  is guilty of a gross misdemeanor.

23  
24                  53. RCW 9A.82.060 provides for leading organized crime. Precisely, that intentionally organizing,  
25                  managing, directing, supervising, or financing any three or more persons with the intent to  
26                  engage in a pattern of criminal profiteering activity. All elected officials listed in this notice  
27                  have committed and admitted the prior listed crimes. Moreover, each elected official named in  
28                  this notice, that has received an affidavit from the Plaintiff has committed the detailed crimes

1 and admitted to the listed crimes by tacit assent, tacit consent, acquiescence, and or silence in at  
2 least 3 unrebutted affidavits and are thus guilty of organized crime, 18 U.S.C. §§ 1961–1  
3 RICO.

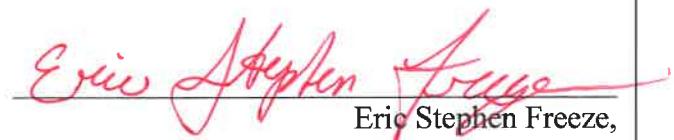
4 **V. REQUEST FOR RELIEF**

5 REASONS WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests this Court to  
6 GRANT him the following reliefs:

- 8 a. Plaintiff is granted Leave of Court to Notify Superior court of filing of a notice of removal.
- 9 b. AWARD judgment in favor of Plaintiff and against Defendants;
- 10 c. AWARD Plaintiff damages in the sum of \$7,787,885.00;
- 11 d. ISSUE an Order of Specific Performance rescinding all Skagit Superior Court's orders, that  
12 would allow Plaintiff back into his home Property without restrictions.
- 13 e. AWARD Plaintiff punitive damages;
- 14 f. AWARD Plaintiff costs of this suit;
- 15 g. AWARD Plaintiff such equitable relief as this Court deems fair under the circumstances; and
- 16 h. AWARD Plaintiff such further relief as this Court deems fit and proper.
- 17 i. Plaintiff is granted Leave of Court to pursue claims on all Official Bonds of DON  
18 McDERMOTT, RICHARD A. WEYRICH, LAURA M. RIQUELME, SANDRA PERKINS,  
19 LISA JANICKI, PETER BROWNING, and RONALD WESEN.
- 20 j. The Plaintiff respectfully requests that this Court take any other action against the Defendants,  
21 it finds appropriate, including referral for a criminal investigation.

22 Dated this 29 day of December, 2022.

23 Respectfully Submitted,

24   
25 Eric Stephen Freeze,  
26

27 Plaintiff in *pro per*